

## REMARKS

An Office Action mailed June 29, 2004, rejected Claims 1-28 under 35 U.S.C. § 112, Claims 1-3, 13-17, 27 and 28 under 35 U.S.C. § 102 and Claims 4-12 and 18-26 under 35 U.S.C. § 103. Pursuant to 37 CFR § 1.111, Applicant hereby respectfully requests reconsideration of the application.

### REJECTION OF CLAIMS UNDER 35 U.S.C. § 112, FIRST PARAGRAPH

The Office Action rejected Claims 2, 3, 16 and 17 for not being enabled. The Office Action states that the specification does not reasonably provide enablement for a valid type dependency. Applicant respectfully traverses this rejection.

Applicant submits that the specification indicates that a “go icon” is displayed with a node if it is determined that no caution dependencies occur for that node (page 5, lines 6-15). A determination of lexical dependency inversion is equivalent to a caution type dependency situation (page 11, line 11 - page 12, line 7). Therefore, when a lexical dependency inversion does not exist, then no caution dependency has occurred for a node and a “go icon” is displayed, i.e., the dependency is a valid type dependency. Thus, Applicant submits that the specification enables a person skilled in the art to make or use the invention commensurate in scope with the claims.

### REJECTION OF CLAIMS UNDER 35 U.S.C. § 112, SECOND PARAGRAPH

The Office Action rejected Claims 1-28 as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

With regard to Claims 1 and 15, Applicant hereby amends Claims 1 and 15 in order to overcome the noted rejection.

With regard to Claims 2, 3, 16 and 17, Applicant submits that a valid type dependency is associated with a node that does not exhibit a caution dependency and where a “go icon” is

displayed (page 5, lines 6-15). Therefore, Applicant submits that Claims 2, 3, and 17 particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

REJECTION OF CLAIMS UNDER 35 U.S.C. § 102

The Office Action rejected Claims 1-3, 13-17, 27 and 28 as being anticipated by Preston. The Office Action states that Preston discloses viewing a data dictionary structure comprising a data dictionary retrieval component that includes terms and term definitions, a second component for determining all lexical nodes based on the terms, a third component that parses each term's definition, a fourth component that determines dependencies of each node based on the parse definitions and the terms associated with other lexical nodes, and a fifth component that generates a lexical graph based on the determined nodes and dependencies. Applicant respectfully traverses this rejection.

Applicant submits that Preston is most likely retrieving a lexical database, however, lexical nodes of the lexical database are not determined by Preston. Preston is identifying semantically meaningful elements in inputted text which is different than the lexical database. Preston uses the lexical database in order to identify semantically meaningful elements in the inputted text and derive relationships between the identified semantically meaningful elements. Preston discloses a freeform source document as inputted and processed to locate semantically meaningful entities and to store corresponding content data and is not a method for viewing a data dictionary structure. Thus, Applicant submits that Preston fails to teach or suggest retrieving a data dictionary that includes termed definitions determining lexical nodes of the data dictionary based on the terms, parsing each term's definition, and determining dependencies of the nodes based on the parsed definitions and terms associated with other determined lexical nodes.

Therefore, Applicant submits that independent Claims 1 and 15 are allowable over the cited reference.

Referring to Claims 2 and 16, Applicant submits that in addition to the arguments noted above, these claims are allowable for the following additional reason. Applicant submits that Preston fails to teach or suggest that the determined dependencies are selected from a list consisting of valid-type dependencies, caution-type dependencies, or cyclical-type dependencies. Therefore, Applicant submits that Claims 2 and 16 are allowable for these additional reasons.

Because Claims 2, 3, 13, 14, 16, 17, 27, and 28 depend from allowable independent claims, they are allowable for the same reasons that make their corresponding independent claims allowable.

REJECTION OF CLAIMS 4-7 AND 18-21 UNDER 35 U.S.C. § 103

The Office Action rejected Claims 4-7 and 18-21 as being unpatentable over Preston in view of Can et al. (hereinafter Can). The Office Action states that Preston discloses all the claims' subject matter as set forth above, but fails to disclose determining a lexical stability value for each node. Applicant respectfully traverses this rejection.

Applicant submits that stability analysis performed by Can refers to stability analysis of the CC-based maintenance algorithm. Therefore, Applicant submits that Can fails to teach or suggest retrieving a data dictionary including terms and term definitions, determining lexical nodes of the data dictionary, parsing each term's definition, and determining dependencies of the nodes based on the parsed definitions and the terms associated with other determined node. Therefore, Applicant submits that because Claims 4-7 and 18-21 depend from allowable independent claims, they are allowable for the same reasons that make their corresponding independent claims allowable.

REJECTION OF CLAIMS 8-12 AND 22-26 UNDER 35 U.S.C. § 103

The Office Action rejected Claims 8-12 and 22-26 as being unpatentable over Preston in view of Can and further in view of Fayyad et al. (hereinafter Fayyad). The Office Action states

that neither Preston nor Can disclose displaying an aggregate stability value and that Fayyad does display an aggregate stability value. Applicant respectfully traverses this rejection.

Fayyad discloses a weighting factor proportional to H2 (probability density value) (col. 6, lines 20-23). Applicant submits that Fayyad fails to teach or suggest displaying and determination of an aggregate stability value. The aggregate stability value is described in the specification on page 9. The aggregate stability value is not a weighting value, but is a measure of the transitive closure of lexical dependency relations within a subgraph. This provides some useful information for a user of the system.

Therefore, because Claims 8-12 and 22-26 depend from allowable independent claims, they are allowable for the reasons noted above and for the same reasons their corresponding independent claims are allowable.

### CONCLUSION

Applicant respectfully submits that all of the claims of the pending application are now in condition for allowance over the cited references. Accordingly, Applicant respectfully requests withdrawal of the rejections, allowance, and early passage through issuance. If the examiner has any questions, the examiner is invited to contact the Applicant's agent listed below.

Respectfully submitted,

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